

*JWMS
3/8/2011*
LJW: USAO# 2010R00991

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

William G. HILLAR

Defendant

*
*
* CRIMINAL NO. WDQ-11-052
*
* (Mail Fraud, 18 U.S.C. § 1341;
* Wire Fraud, 18 U.S.C. § 1343)
*

SUPERSEDING INDICTMENT

COUNTS 1-13
(Mail Fraud)

The Grand Jury for the District of Maryland charges:

At all times relevant to this Indictment:

1. Defendant WILLIAM G. HILLAR, resided in Anne Arundel County, Maryland, and is the principal of Bill Hillar Training..

The Scheme to Defraud

2. From in and around 1998 and continuing until in or around January 25, 2011, in the District of Maryland and elsewhere, the defendant,

WILLIAM G. HILLAR

knowingly and willfully devised and intended to devise a scheme and artifice to defraud the Monterey Institute of International Studies, the University of Oregon, the Federal Executive Board of Los Angeles, and others to obtain money and property by means of materially false and fraudulent pretenses, representations and promises ("the scheme to defraud").

Object of the Scheme to Defraud

3. It was the object of the scheme to defraud that defendant WILLIAM G. HILLAR falsely represented his professional and educational credentials to public and private organizations including universities, government agencies, law enforcement organizations and others in order to obtain payment for leading workshops, teaching courses and giving speeches.

Manner and Means

4. HILLAR has been teaching, leading workshops, giving speeches, and conducting training for public and private sector clients for at least the past twelve (12) years under fraudulent pretenses.
5. HILLAR conducts these activities through a business named "Bill Hillar Training." Bill Hillar Training is also the registrant for <billhillartraining.com>.
6. HILLAR has advertised himself as a speaker and trainer through various media including the world wide web. The website <billhillartraining.com> provided the following false biographical statement for HILLAR, "William G. Hillar is a retired Colonel of the U.S. Army Special Forces. He has served in Asia, the Middle East, and Central and South America, where his diverse training and experiences included tactical counter-terrorism, explosive ordnance, emergency medicine and psychological warfare." Further, a resume provided by HILLAR to at least one of his clients falsely states that HILLAR received a Ph.D. from the University of Oregon.

7. From on or around 1998 to 2010, the following organizations, among others, paid HILLAR at least \$164,057.70 for teaching, leading workshops and speaking:

ORGANIZATION	DATE	AMOUNT
University of Oregon	2002-2010	\$33,025.00
Monterey Institute of International Studies	2005-2010	\$32,500.00
Federal Executive Board of Los Angeles	2000-2010	\$27,140.00
Federal Bureau of Investigation (FBI) Command College	2000-2010	\$17,369.38
Montana Sheriff and Peace Officers Association	6/11/2003	\$9,500.00
Utah Valley State College	2007-2008	\$8,430.00
State Training and Audit Resource Seminar (STARS) 2007 conference	12/11/2007	\$4,000.00
U.S. Army (APG)	3/5/2007	\$3,625.00
National Law Enforcement Telecommunications Systems (NLETS) 2008 Conference	5/30/2008	\$3,129.00
College of Southern Maryland	2005-2006	\$3,088.75
Salt Lake City Corporation	9/9/2010	\$2,583.00
Murray City Corporation	10/29/2009	\$2,400.00
Drug Enforcement Agency (DEA)	10/9/2009	\$2,400.00
Southwestern Oregon Fire Instructors Association	5/12/2008	\$2,241.00
U.S. Department of Interior, Bureau of Indian Affairs	3/11/2010	\$2,135.50
California Fire Chiefs Association	10/4/2007	\$1,980.81
City of Lander, WY	8/25/2010	\$1,800.00
City of Redmond	6/10/2010	\$1,609.00
Georgia Terminal Agency Coordinators (TAC) Conference	10/3/2008	\$1,240.50
FBI Salt Lake City Division	4/21/1998	\$1,010.00
FBI Chicago Division	6/4/2002	\$1,000.00
Freemont County Community College	9/23/2010	\$1,000.00
Illinois Drug Enforcement Officers Association	3/10/2002	\$850.00
TOTAL		\$164,057.70

8. At the Monterey Institute, HILLAR taught twelve (12) courses/workshops, including courses on human trafficking and tactical counter terrorism. The Monterey Institute hired HILLAR based upon his purported experience and credentials including, but not limited to, his experience in the U.S. Army Special Forces, and his educational background including a Ph.D.
9. During his tenure at the University of Oregon, HILLAR taught approximately eighteen (18) courses and workshops on topics including human trafficking, international drug smuggling, drug trafficking, international drug trafficking and tactical counter terrorism. The University of Oregon hired HILLAR based upon his purported "real world" experience serving in the U.S. Army.
10. HILLAR provided the University of Oregon with a resume that included false information in order to secure employment with the university and later provided, on at least one occasion, another resume that included false information in order to continue teaching for compensation at the University. That resume contained information that Hillar served in the U.S. Army from 1962- 1990.
11. In addition to teaching at these two universities, HILLAR gave speeches to law enforcement and public safety organizations including, among others, the California Fire Chief's Association for compensation. The California Fire Chief's Association hired HILLAR to speak based on his purported experience as a retired Colonel in the U.S. military and his educational credentials, including his Ph.D.

The Charge

12. On or about the dates shown below, in the District of Maryland, the defendant,

WILLIAM G. HILLAR

for the purpose of executing and attempting to execute the scheme to defraud, did knowingly cause to be delivered by mail to according to the direction thereon, mail matter as shown below:

COUNT	DATE	FROM	TO	CONTENTS
1	2/28/06	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #131581 in the amount of \$2,500.00
2	5/03/06	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #134990 in the amount of \$2,500.00
3	10/11/06	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #137622 in the amount of \$2,500.00
4	5/23/07	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #10000355 in the amount of \$2,500.00
5	10/03/07	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #10002636 in the amount of \$2,500.00
6	3/05/08	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #10005164 in the amount of \$2,500.00

COUNT	DATE	FROM	TO	CONTENTS
7	10/08/08	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #10008423 in the amount of \$3,000.00
8	3/11/09	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	First National Bank check #10010791 in the amount of \$3,000.00
9	07/07/10	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	Wells Fargo check #10017082 in the amount of \$2,145.00
10	11/3/10	Monterey Institute of International Studies, Monterey, CA	William G. Hillar, 472 Old Orchard Circle, Millersville MD 21108	Wells Fargo check #10018656 in the amount of \$2,040.00
11	11/03/06	University of Oregon Eugene, OR	William G. Hillar, 472 Old Orchard Circle, Millersville, MD 21108	check # 52228618 in the amount of \$1,200.00
12	1/30/07	University of Oregon Eugene, OR	William G. Hillar, 472 Old Orchard Circle, Millersville, MD 21108	check # 5225027 in the amount of \$1,200.00
13	7/18/07	University of Oregon Eugene, OR	William G. Hillar, 472 Old Orchard Circle, Millersville, MD 21108	check # 52291935 in the amount of \$1,575.00

18 U.S.C. § 1341

COUNTS 14-16

(Wire Fraud)

And the Grand Jury for the District of Maryland further charges:

1. The allegations contained in paragraphs 1 through 11 of Counts 1-13 are re-alleged and incorporated by reference as though fully set forth herein.
2. From in and around **1998** and continuing until in or around January 25, 2011, in the District of Maryland and elsewhere, the defendant,

WILLIAM G. HILLAR

knowingly and willfully devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises and material omissions.

3. For the purpose of executing the scheme and artifice to defraud, the defendant did knowingly transmit and cause to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds as set forth in the Counts below:

COUNT	DATE	ITEM
14	10/3/07	Wire communications in interstate commerce, of signs, signals and sounds from Severna Park, MD to Eugene, OR, to wit: a facsimile "Statement" requesting payment for and reimbursement of expenses associated with a speech HILLAR gave to the California Fire Chief's Association Annual Conference and Leadership Seminar, September 24-27, 2007, in the amount of \$1,980.81

COUNT	DATE	ITEM
15	6/29/2010	Wire communications in interstate commerce, of signs, signals and sounds from Millersville, MD to Eugene, OR, to wit: an e-mail from HILLAR to an official at the University of Oregon directing that official to HILLAR's "bio" on his website www.billhillartraining.com ; attached to this e-mail was a resume for HILLAR.
16	10/15/2010	Wire communication in interstate commerce, of signs, signals and sounds from Severna Park, MD to Monterey, CA, to wit: a facsimile "Statement" signed by HILLAR and faxed from "The UPS Store" #0871 in Severna Park, MD, to the Monterey Institute of International Studies requesting payment in the amount of \$3,000.00 for a "Human Trafficking Workshop" conducted by HILLAR on October 8-10, 2010.

18 U.S.C. Section 1343

FORFEITURE ALLEGATIONS

As a result of the offense set forth in Counts 1-16, the defendant,

WILLIAM G. HILLAR

shall forfeit to the United States all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of that offense, and all property traceable to such property, including but not limited to \$164,057.70 and all interest and proceeds traceable thereto.

18 U.S.C. section 982(a)(2)and (4).

SUBSTITUTE ASSETS

If any of the \$164,057.70 described above as being subject to forfeiture, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the property charged with forfeiture above, including but not limited to the following:

- The funds and property held by LPL Financial, Investment Account #6899-6851, Primary account holder, William G. Hillar, 472 Old Orchard Circle, Millersville, MD 21108.


ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

A TRUE BILL:

SIGNATURE REDACTED

FOREPERSON

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DATE